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June 30, 2022

VIA ECF

Judge Paul A. Engelmayer
United States District Court
40 Foley Square, Room 2201
New York, NY 10007

Re: *Gill v. National Football League, et al.*, No. 21 Civ. 1032
Request for Sealing

Dear Judge Engelmayer:

The Parties respectfully request that the unredacted version of Exhibit A to the Declaration of Karl Kronenberger, be sealed, as the document contains proprietary and trade information of the National Football League, its affiliates and licensees. Plaintiff has filed a redacted version of Exhibit A as ECF No. 89-1.

Rule 4(B)(1) of Your Honor's Individual Rules and Practices permits a party to redact financial information, proprietary or trade secret information. The contract, with redactions, has been publicly filed at ECF No. 89-1. Plaintiff is filing the unredacted version under seal, concurrently with this letter.

The document to be sealed has been designated "Highly Confidential." And this Court has already ordered that similar contracts between the NFL and third-parties can be filed with redactions. *See* ECF No. 80. Moreover, this Court has permitted narrowly tailored redactions of filings in order to prevent the disclosure of confidential proprietary information damaging to competitive interests. *See Leonard v John Hancock Life Ins. Co.*, No. 18-cv-4994-AKH, 2021 U.S. Dist. LEXIS 102680, at **12-13 (S.D.N.Y. May 26, 2021); *Sellick v. Consol. Edison Co. of NY, Inc.*, No. 15-cv-9082 (RJS), 2017 U.S. Dist. LEXIS 43554, at *24-25 (S.D.N.Y. Mar. 23, 2017).

Disclosure of this information could be detrimental to the National Football League and provide competitors proprietary information. Accordingly, the Parties request that the Court seal the unredacted version of ECF No. 89-1.

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June 30, 2022
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Respectfully submitted,

/s/ Raphael Janove

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cc: All counsel of record (via ECF)

Enclosures

Granted. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
7/1/22